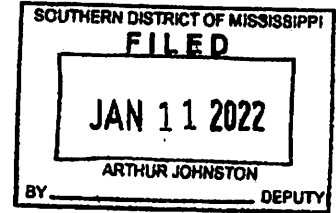


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:22cr1TBM-RPM*

MICHAEL DEON FULCHER and
JONZIE HAMILTON

18 U.S.C § 1591
18 U.S.C § 1594
18 U.S.C § 2421

The Grand Jury charges:

COUNT 1

In or about and between April 2020 and June 2020, in Harrison County, in the Southern Division of the Southern District of Mississippi and elsewhere, defendants **MICHAEL DEON FULCHER and JONZIE HAMILTON**, in and affecting interstate commerce, and aiding and abetting each other, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained A.J., an adult female, whose identity is known to the Grand Jury, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause A.J. to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 1594(a) and Section 2.

COUNT 2

In or about and between April 2020 and June 2020, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, defendants **MICHAEL DEON FULCHER and JONZIE HAMILTON** did conspire with each other in and affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any

means A.J., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause A.J. to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a), (b)(1), (b)(2), and (c), all in violation of Title 18, United States Code, Section 1594(c).

COUNT 3

In or about and between April 2020 and June 2020, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, defendants **MICHAEL DEON FULCHER and JONZIE HAMILTON**, aiding and abetting each other, knowingly transported A.J., an adult female, whose identity is known to the Grand Jury, in interstate commerce from Nevada to Mississippi, with intent that A.J. engage in prostitution.

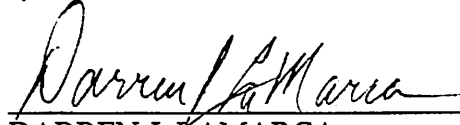
In violation of Title 18, United States Code, Section 2421 and Section 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

If convicted of any violation of Title 18, United States Code, Section 1591, or Title 18, United States Code, Section 2421, as alleged in Counts 1 through 3 of this Indictment, defendants **MICHAEL DEON FULCHER and JONZIE HAMILTON**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds obtained, directly or indirectly, as the result of the violation, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of

the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1), 1594(d)(2), and 2428(a); and Title 28, United States Code, Section 2461.



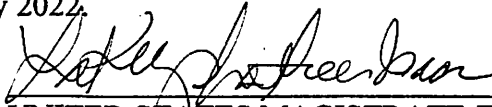
DARREN J. LAMARCA
United States Attorney

A TRUE BILL:

S/SIGNATURE REDACTED

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this, the 11th day of January 2022.



UNITED STATES MAGISTRATE JUDGE